

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

EMILY DAVIS,)	
)	
Plaintiff,)	
)	
v.)	Cause No. 4:18-cv-01574
)	
CITY OF SAINT LOUIS, MISSOURI, et al.)	
)	
Defendants.)	

**CONSENT MOTION TO EXTEND DEADLINE TO
COMPLETE DISCOVERY ON JOHN DOE DEFENDANTS**

With consent of Defendants, Ms. Davis moves the Court to extend the deadline to identify the John Doe Defendants, to allow the parties to conduct additional discovery. In support of this motion, Ms. Davis state as follows:

1. On September 17, 2019, Ms. Davis submitted an Unopposed Motion for Limited Discovery to allow Ms. Davis to conduct discovery to identify the John Doe Defendants named in his complaint. (ECF 50). Ms. Davis asked the Court to enter such an order Court to enter an order allowing the parties to engage in discovery through November 16, 2019

2. On September 18, 2019, the Court granted this Motion. (ECF No. 50).

3. Parties have been working diligently towards identifying the Doe Defendants.

4. Pursuant to this Order, and Orders in other cases involving clients with similar claims to Ms. Davis, Defendants have produced over 60 hours of video, over 20 hours of audio recordings, and thousands of pages of documents. These materials showed that hundreds of SLMPD officers interacted with those arrested during the kettle.

5. Also pursuant to this order, Ms. Davis' counsel sent Defendants interrogatories and requests for production specifically targeted at identifying the relevant SLMPD officers who interacted with Ms. Davis.

6. After review of these videos and documents, Ms. Davis' counsel and Defendants met on October 21, 2019, to discuss how best to proceed with identification. Plaintiff requested depositions of SLMPD officers who served as leaders of the varying SLMPD teams, and thus would know which teams interacted with what arrested individuals. The parties are working together to schedule those depositions.

7. Both parties anticipate that significant progress in identifying specific officers as John Doe Defendants can be made in the coming months given the vast production of documents and the proposed depositions.

8. Defendants have been apprised of this request and consent to this extension of the deadline.

9. No party will be prejudiced by the extension of this deadline. The requested relief will not require any modification of any other orders from this Court.

WHEREFORE, for the reasons stated above, Ms. Davis, with the agreement and consent of Defendants, requests this honorable Court extend the deadline for Plaintiffs to identify John Doe Defendants to on or before January 28, 2020.

Date: November 14, 2019

Respectfully submitted,

KHAZAELI WYRSCH LLC

By: /s/ James R. Wyrsh

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